UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Plaintiffs,

v.

18-CV-2921 (JMF)

UNITED STATES DEPARTMENT OF COMMERCE, et al.,

Defendants.

NEW YORK IMMIGRATION COALITION, et al.,

Plaintiffs.

٧.

UNITED STATES DEPARTMENT OF COMMERCE, et al.,

Defendants.

18-CV-5025 (JMF) (Consolidated Case)

JOINT STIPULATION REGARDING SCOPE OF ADMINISTRATIVE RECORD

The parties hereby stipulate to the inclusion of the following materials in the Administrative Record in this case:

63. The Administrative Record contains all documents produced by Defendants bearing Bates 000001 through 0013024. These have been marked by plaintiffs as PX-1 through PX-14. In addition, the Administrative Record includes the documents listed below:

PX-17 to PX-153

PX-155

PX-158

PX-167 to PX-173

PX-175 to PX-181

PX-183

PX-185 to PX-186

PX-188

PX-190 to PX-191

PX-285 to PX-286

PX-315

PX-357

PX-372

PX-490

PX-523 to PX-524

PX-537

PX-542 to PX-558

PX-565

PX-568 to PX-603

PX-605 to PX-622

PX-656

Further, the parties agree that the exhibits listed in Paragraph 63 of the parties' joint stipulations above that have not already been admitted (PX-178, PX-181, PX-185, PX-188, PX-190, PX-191, PX-544, PX-614) may be admitted into evidence.

The parties are continuing to discuss the possibility of stipulating to the inclusion of additional materials in the Administrative Record, and Plaintiffs reserve the right to move that additional materials be considered part of the Administrative Record in this action.

Dated: November 11, 2018

Respectfully submitted,

BARBARA D. UNDERWOOD

Attorney General of the State of New York

SO ORDERED.

November 13, 2018

By: /s/ Matthew Colangelo

Matthew Colangelo, Executive Deputy Attorney General

Elena Goldstein, Senior Trial Counsel

Office of the New York State Attorney General

28 Liberty Street

New York, NY 10005

Phone: (212) 416-6057

matthew.colangelo@ag.ny.gov

Attorneys for the State of New York Plaintiffs

AMERICAN CIVIL LIBERTIES UNION ARNOLD & PORTER KAYE SCHOLER LLP

By: /s/ Dale Ho

Dale Ho American Civil Liberties Union Foundation 125 Broad St. New York, NY 10004 (212) 549-2693 dho@aclu.org

Sarah Brannon*
American Civil Liberties Union Foundation
915 15th Street, NW
Washington, DC 20005-2313
202-675-2337
sbrannon@aclu.org
* Not admitted in the District of Columbia;
practice limited pursuant to D.C. App. R.

Perry M. Grossman

New York Civil Liberties Union Foundation 125 Broad St.
New York, NY 10004 (212) 607-3300 601 pgrossman@nyclu.org

Andrew Bauer Arnold & Porter Kaye Scholer LLP 250 West 55th Street New York, NY 10019-9710 (212) 836-7669 Andrew.Bauer@arnoldporter.com

John A. Freedman Arnold & Porter Kaye Scholer LLP 601 Massachusetts Avenue, N.W. Washington, DC 20001-3743 (202) 942-5000 John.Freedman@arnoldporter.com

Attorneys for the NYIC Plaintiffs

Counsel for Defendants

JOSEPH H. HUNT Assistant Attorney General

BRETT A. SHUMATE
Deputy Assistant Attorney General

JOHN R. GRIFFITHS Director, Federal Programs Branch

CARLOTTA P. WELLS Assistant Branch Director

/s/ Kate Bailey
KATE BAILEY
GARRETT COYLE
STEPHEN EHRLICH
CAROL FEDERIGHI

Trial Attorneys
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L Street NW, Washington, DC 20005
(202) 514-9239
kate.bailey@usdoj.gov